

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

IN THE MATTER OF THE ARREST OF

Case No.: 4:20-mj-00007-SAO

Jayson Knox

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**


I, Jolene Goeden, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND TASK FORCE OFFICER BACKGROUND

1. I have been a Special Agent with the FBI since March 2004. Since that time, I have been assigned investigative responsibilities in the areas of crimes against children, human trafficking, violent gangs and criminal enterprise investigations in the FBI Anchorage Field Office, where I am currently assigned. The Anchorage Field Office is located within the District of Alaska. During this assignment, I have focused on child pornography, kidnapping, human trafficking, drug, violent gang, criminal enterprises, and felon in possession of a weapon investigations. I have been involved in cases involving the investigation and prosecution of defendants for violations of Title 18 of the United States Code. Further, I have conducted and participated in a number of search warrants, arrest warrants, and interviews of people involved in federal crimes and criminal enterprises.

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2. I have been involved in hundreds of investigations involving minors who are victims of state and federal child exploitation crimes, to include sexual assault, child pornography, and coercion and enticement. I have interviewed dozens of victims of these crimes. I know from my training and experience that each victim's willingness to communicate the full extent of how they were victimized is different, and that these differences are the result of multiple factors, including the victim's age, mental health, education level, developmental level, socio-economic status, and parental or community support. Forensic interviews are the preferred method of acquiring information from a child victim of sexual abuse. However, I know that even children who are forensically interviewed often do not disclose the full extent of their victimization in an initial forensic interview, even when there exists physical evidence, or images and videos detailing the abuse. In some cases, the full extent of a victim's abuse is never fully known.

3. This affidavit is filed in support of a Criminal Complaint that seeks authorization to arrest JAYSON KNOX (hereinafter "SUBJECT") for violations of the following statutes:

- a. 18 U.S.C. § 2251, Attempted Sexual Exploitation of a Child.
- b. 18 U.S.C. § 1470, Transfer of Obscene Material to a Minor; and
- c. 18 U.S.C. § 2422(b), Attempted Coercion and Enticement of a Minor.

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4. The statements in this affidavit are based in part on information provided to me by other law enforcement officers, police reports, my own investigation of this matter, and my training and experience. Since this affidavit is being submitted for the limited purpose of providing factual support for a Criminal Complaint, I have not included each and every fact known to me concerning this investigation. I have only set forth the facts that I believe are necessary to establish probable cause to believe that JAYSON KNOX has committed violations of 18 U.S.C. § 2251, Attempted Sexual Exploitation of a Child; 18 U.S.C. § 1470, Transfer of Obscene Material to a Minor; and 18 U.S.C. § 2422(b), Attempted Coercion and Enticement of a Minor.

RELEVANT STATUTES

5. The following statutes are relevant to this affidavit:
- a. 18 U.S.C. § 2251(a) prohibits employing, using, persuading, inducing, enticing, or coercing any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce.
 - b. 18 U.S.C. § 1470 prohibits using a means and facility of interstate and foreign commerce, to knowingly transfer obscene matter to another



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individual who has not attained the age of 16 years, knowing that such individual has not attained the age of 16 years, or attempting to do so.

- c. 18 U.S.C. § 2422(b), prohibits using the mail or any facility of interstate of foreign commerce, to knowingly persuade, induce, entice, or coerce, any individual who has not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, or attempt to do so.

DEFINITIONS

6. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. *Internet*: The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.
- b. *Minor*: The term “minor” means any person under the age of eighteen years. *See* 18 U.S.C. § 2256(1).
- c. *Sexually explicit conduct*: “Sexually explicit conduct” includes the lascivious exhibition of the anus, genitals, or public area of any person. *See* 18 U.S.C. § 2256(2)(A).



- d. *Visual Depictions*: "Visual depictions" include undeveloped film and videotape, and data stored on computer disk or by electronic means, which is capable of conversion into a visual image. *See* 18 U.S.C. § 2256(5).

FACTS IN SUPPORT OF PROBABLE CAUSE

Initial Referral to FBI by Alaska State Troopers

7. On February 3, 2020, SA Goeden was contacted by Alaska State Trooper Lt. Ramin Dunford regarding a child exploitation case in Kivalina, Alaska. Lt. Dunford provided the following general information about Jayson Knox and allegations that he had engaged in inappropriate conduct with minors in Kivalina, Alaska.

- a. In September 2019, several students reported to a teacher that Jayson Knox, a substitute teacher at their school, had asked them to send nude photos and meet with them.
- b. In January 2020, Alaska State Trooper Nay interviewed several children in Kivalina and also interviewed Knox.

Investigation by FBI and Review of AST Materials

8. On February 7, 2020, SA Goeden interviewed Kivalina McQueen School Principle Lyle Melkerson. Melkerson stated a female child first approached him and said Knox was looking at her weird but did not disclose anything further. A few days later, several girls approached their teacher and told her that Knox asked them to send nude photos. The girls identified the person who they alleged had acted inappropriately



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as Jason Knox or "Birdie." Melkerson stated Knox's nickname is "Birdie," and this is a well-known nickname for him in the community. Knox began working at the school as a substitute in 2018.

Child Interviews Conducted By Trooper Nay

9. Victim A, age 11, resides in Kivalina and reported she was contacted by Knox via Snapchat. Knox asked Victim A to send him nude images. Knox also indicated he wanted to have "fun" with girls and Victim A stated she knew fun to mean touching. Victim A stated she blocked Knox on Snapchat and couldn't remember his username.

10. Victim B, age 14, resides in Kivalina and reported she was contacted by Knox via Facebook Messenger. Victim B stated Knox messaged her every night saying he wanted her to go to him. Victim B stated this happened during the previous two summers. The Facebook name of the person contacting Victim B was "Jayson Knox."

11. Victim C, age 15, resides in Kivalina and reported Knox asked her and her friend, Victim D, via cellphone to meet him. Knox said he "wanted us two girls." They met with Knox but did not report that any sexual contact occurred.

12. Victim D, age 16, resides in Kivalina and reported Knox contacted her via Facebook Messenger and asked if she could go to his house when he was alone. When asked how many times Knox messaged her like this, she stated "lots". Victim D stated this occurred from about June or July until December.

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13. Victim E, age 12, resides in Kivalina and reported Knox contacted her via Snapchat and Facebook Messenger. Victim E said Knox “was begging for adult things”. When asked what adult things she said Knox asked her to send nude pictures. Knox also asked to meet with Victim E but she did not go. Victim E states this occurred during the previous summer and into the school year. Victim E stated the Knox’s Facebook Messenger account is his first and last name. When asked about his Snapchat username, she stated, “he has lots”.

Interviews With Jayson Knox Conducted By Trooper Nay

14. Trooper Nay conducted two non-custodial interviews of Knox in Kivalina in January 2020. In summary, Knox stated the following:

- a. Knox stated he wasn’t going to hide anything and admitted to communicating with “several girls, texting them to go do fun stuff with me”. He stated he did this a few times and knew it was wrong.
- b. Knox admitted to communicating with five underage girls, however, when presented with additional girl’s names he admitted to contacting these other girls also. Knox stated that with some of the girls the communication was “just for nudes” and not to “hang out”. He stated the communication began when he started working for the school.
- c. Knox stated his current Snapchat ID was “jaysonknox98.” He did not remember his previous Snapchat ID.



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- d. Knox denied requesting images of specific body parts and stated he only asked for nudes.
 - e. When asked about meeting Victim C and D, the Subject stated he intended for something to happen but when it came down to it he couldn't do anything.
15. Knox consented to a review of his cellphone. This cellphone has been received by the FBI and is being reviewed.

Child Forensic Interviews

16. On February 25, 2020, FBI agents, including the affiant, and child forensic interviewers traveled to Kivalina. FBI agents conducted multiple interviews of minors that Knox is alleged to have approached and communicated with. A summary of those interviews is as follows:

17. Victim A stated Knox contacted her on Snapchat and asked her to send nudes pictures. He did not specify what nudes meant but she thought that meant bikini pictures. He asked for nudes four times.

18. Victim B stated Knox asked her for nudes three times and nudes meant "bottom and boobs." Victim B was shown an Anatomical Identification (AI) diagram which is an anatomically correct drawing of a male and female body. The interviewer uses this diagram to establish words a child uses to identify body parts. Victim B marked the breasts and buttocks to indicate what body parts Knox asked her to take pictures of and send to him. Victim B stated she did not send him any pictures.

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19. Victim C stated Knox asked her to send photos of her “front part” and “boobs”. When asked to clarify on the Anatomical Indicator form, Victim C marked breasts and vaginal area. Knox asked her to send photos four times. When she didn’t send the photos, Knox said he wouldn’t talk to her anymore. In addition to asking Victim C to send photos, Knox also asked if he could “finger” her and on the Anatomical Indicator form circled the vagina and butt as the areas he was going to digitally penetrate. Victim C stated a couple of winters ago, Knox also asked her and a friend to go to the community building to do sexual things.

20. Victim C stated Knox told her he was afraid the girls would go to their parents because one already did and the dad went into “beast mode”. SA Goeden believes this reference was to Victim E’s father confronting Knox (see paragraph 25).

21. Victim D (see paragraphs 14.e and 30.d) was unavailable to meet with the FBI forensic interviewer, but will be interviewed at a later date.

22. Victim E stated Knox asked her for nude photographs approximately ten times via Snapchat. Knox specifically asked her to send photographs of her “boobs, front part, and butt.” Knox also sent Victim E a photo of his penis two times via Snapchat.

23. Victim E stated Knox texted her to meet with him to touch her “privates” and specifically asked to touch her “front part” and “butt”. Victim E was shown an AI Form and identified the vaginal area to mean “front part”.



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24. Knox asked to meet Victim E at an abandoned building. She and a friend went to that building and saw Knox standing outside. They walked by and did not go in.

25. SA Goeden contacted Victim E's father. He stated Victim E told him about the messages from Knox. In response, Victim E's father texted Knox and confronted him about Knox's contact with his daughter. The following is a portion of the text exchange between Victim E's father and Knox:

Father: What you trying to my daughter?? Shes fkn 12 years old boy you better leave the fk alone you hear me!!!!

Knox: I'm sorry

Father: Leave her alone and where good

Knox: I'm sorry (father's name) (sad face emoji) I'm jus tired of being alone and facing my battles

Father: Find somebody your age but not my baby

Knox: I hear you (father's name)

26. Victim F is a 16 year old girl who resides in Kivalina. Knox contacted her via Facebook Messenger and asked her for nude photos. Victim F stated nudes meant "boobs" and "bottom". When shown the AI Form, Victim F indicated that "bottom" mean the vaginal area.

27. Victim G is a 16 year old girl who resides in Kivalina. Knox contacted her using three different Snapchat accounts he used. Victim G showed SA Goeden the messages in her Snapchat account. Of the three Snapchat accounts used by Knox, one



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of them contained messages with sexual content to Victim G. These messages started on December 8, 2019 to January 22, 2020. Below are a portion of the messages sent by

Knox:

Knox: Can I eat you up while I'm home alone? (tongue emoji)

Knox: You know you will like it (tongue emoji). All you gotta do is make up your mind, I can keep this a secret (smiley face emoji). I can eat you till you shake (victim name) no joke, I know you like that.

Knox: If your thinking about it, I have until Thursday to be alone in the house I'll do anything for you

Knox: I honestly I start to enjoy you go through phases, as a old adult that I am, I honestly would do anything if you even jus give me a reason to be anything that's apart of your life, (victim name)?

Knox: Can I have at least one chance to make you feel good before I die.


The above messages went unanswered by Victim G. Knox also asked Victim G to "trade nudes" but no pictures were sent.

28. Victim H (see paragraph 30.g) was unavailable to meet with the FBI forensic interviewer but will be interviewed at a later date.

29. Victim I stated Knox asked to meet her but didn't say why. He never asked her for photos.

Interview With Jayxon Knox Conducted By FBI TFO Torres And AST Nay

30. On February 26, 2020, Knox was interviewed by FBI TFO Torres and Trooper Nay in Kivalina. Knox was read his Miranda rights, waived, and agreed to speak to law enforcement. Knox stated the following:


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- a. Knox admitted to being sexually attracted to young girls and that it started after high school. He was attracted to them because it was easier to get them to have sex. Knox stated he knew it was both wrong and illegal.
- b. Knox indicated he thought Victim F was 15 years old. He asked for photos of her breasts, vagina, and buttocks via Facebook Messenger. Victim F sent him the images, he masturbated to the images and deleted him. Knox stated he sent Victim F photos of his penis approximately four times. He told her he wanted to have vaginal and oral sex with her and have her perform oral sex on him. Knox asked her for this multiple times and wanted it to occur at the abandoned warehouse. He also asked Victim F if she knew of other girls that would send him nudes.
- c. Knox indicated he thought Victim B was 15 years old. He asked her for photos of her breasts four times. He sent her a few photos of his penis.
- d. Knox stated he thought Victim D was 15 years old and Victim C was 14 years old. He asked both for photos of their breasts and vagina which they sent to him. Knox stated he masturbated to these images and then deleted the images. Knox stated he scheduled a meeting with both girls to have sex at the warehouse. Knox said he tried to convince the girls to go into the warehouse with him but they did not. He communicated with them via Facebook Messenger.



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- e. Knox stated he thought Victim E was 13 years old. He asked her four times to send photos of breasts, vagina, and butt. Victim E did send him the images he requested. He masturbated to the images and deleted them. Knox also sent Victim E images of his penis. Knox told Victim E he wanted to have sex with her at the warehouse. Knox told her he wanted to touch privates and have sex at the warehouse.
- f. Knox stated he thought Victim A was 12 or 13 years old. He asked her for nudes but wasn't specific. She did not send photos of herself and he did not send her images of his penis.
- g. Knox stated he thought Victim H was 15 years old. He communicated with her via Facebook Messenger. Knox sent her images of his penis. Knox talked and chatted with her about meeting to have sex.
- h. Knox asked Victim I for photos of her breasts, vagina and butt. She did not send him any photos. Agents know that Victim I was 13 years old.
- i. Knox stated he thought Victim J was 15 or 16 years old. He communicated via text messages with Victim J about having sex. He asked her for nudes and she sent images of her bare breasts. Knox met Victim J a few months ago behind the school. He said he tongue kissed her and touched her butt. Victim J was not known to investigators until Knox provided this information.



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CONCLUSION

31. I submit that this affidavit supports probable cause to believe that JAYSON KNOX has committed violations of 18 U.S.C. § 2251, Attempted Sexual Exploitation of a Child; 18 U.S.C. § 1470, Transfer of Obscene Material to a Minor; and 18 U.S.C. § 2422(b), Attempted Coercion and Enticement of a Minor.

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JOLENE GOEDEN
Special Agent
Federal Bureau of Investigation

2/28/20
ELECTRONICALLY
TELEPHONICALLY
Subscribed and sworn to before me this
27 day of February, 2020

2/28/20
in [signature]
~~SCOTT A. ORAVEC~~
United States Magistrate Judge
District of Alaska
Anchorage, Alaska



MATTHEW M. SCOBLE
U.S. Magistrate Judge